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May 5, 2004

Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building, 1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

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Subject: Comments on the HPV Test Plan for Quadrol

Dear Administrator Leavitt:

The following comments on BASF Corporation's test plan for the chemical Quadrol are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

ARCADIS G&M, Inc. submitted its test plan on behalf of BASF Corporation on January 8, 2004, for Quadrol (CAS No. 102-60-3). This chemical is used as an intermediate and catalyst in chemical reactions, as a complexing and chelating agent, and as a humectant, plasticizer, surfactant solubilizer, and viscosity control agent. ARCADIS has submitted a comprehensive analysis of Quadrol, despite limited mammalian toxicological data for this product. They have characterized the hazards associated with Quadrol by comparing it to toxicity data for triisopropanolamine (CAS No. 122-20-3). For instance, reproductive and developmental toxicity studies on triisopropanolamine, a close structural analog of Quadrol, were used to bridge data gaps for these two SIDS endpoints for Quadrol. This is a scientifically valid analysis when considering the toxicity of a chemical and these approaches demonstrate a thoughtful analysis by ARCADIS. We concur that no additional testing is required under the HPV Challenge program.

We commend the efforts of ARCADIS in drawing on existing data from a variety of sources to meet the SIDS endpoints for the Quadrol. This approach is consistent with the EPA's stated goals of maximizing the use of existing data in order to limit additional animal testing. Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 327, or via e-mail at meven@pcrm.org.

Sincerely,

Megha Even, M.S.
Research Analyst

Chad B. Sandusky, Ph.D.
Director of Toxicology and Research